



***COMMONWEALTH of VIRGINIA***  
*Office of the Attorney General*  
*Richmond 23219*

**Jerry W. Kilgore**  
Attorney General

900 East Main Street  
Richmond, Virginia 23219  
804-786-2071  
804-371-8947 TDD

April 1, 2003

The Honorable Robert G. Burnley, Director  
Department of Environmental Quality  
Commonwealth of Virginia  
629 East Main Street  
Richmond, Virginia 23219

Re: Proposed Amendments to Regulations Concerning VOC Early Reduction  
Credit (9 VAC 5 Chapters 20 and 40, Rev. C03)

Dear Mr. Burnley:

I have reviewed the above-referenced proposed regulation amendments, as posted on the Virginia Regulatory Town Hall site.

It is my view that the State Air Pollution Control Board possesses statutory authority to promulgate the above-referenced proposed regulation amendments.

Sincerely,

Carl Josephson  
Assistant Attorney General